Sean C. Sheely Katherine A. Skeele

HOLLAND & KNIGHT, LLP

31 West 52nd Street

New York, NY 10019

Tel: (212) 513-3397

Fax: (212) 395-9010

Bonni Kaufman

HOLLAND & KNIGHT, LLP

2099 Pennsylvania Avenue, N.W.

Washington, DC 20006

Tel:

(202) 955-3000

Fax:

(202) 955-5564

Attorneys for Third-Party Defendant Textron Inc.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, THE COMMISSIONER OF THE NEW JERSEY ENVIRONMENTAL PROTECTION AGENCY, and THE ADMINISTRATOR OF THE NEW JERSEY SPILL COMPENSATION FUND,

Plaintiffs,

VS.

OCCIDENTAL CHEMICAL CORPORATION, TIERRA SOLUTIONS, INC., MAXUS ENERGY CORPORATION, REPSOL YPF, S.A., YPF, S.A., YPF HOLDINGS, INC. and CLH HOLDINGS,

Defendants,

MAXUS ENERGY CORPORATION and TIERRA SOLUTIONS, INC.,

Third-Party Plaintiffs,

VS.

AMERICAN CYANAMID, et.al.

Third-Party Defendants.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: ESSEX COUNTY

DOCKET NO. L-9868-05 (PASR)

CIVIL ACTION

TEXTRON INC.'S CMO V THIRD-PARTY INITIAL DISCLOSURE

INITIAL DISCLOSURES

Comes now Third-Party Defendant Textron Inc. ("Textron") and for its Initial Disclosure in accordance with Case Management Order V provides the following specific information.

Reservations:

- 1. Textron reserves the right to object to the production of any documents or other information on any ground, including relevance and undue burden, and to assert any applicable privilege, including the attorney-client privilege, the work product doctrine, the common interest doctrine, and other applicable privilege or protection. These disclosures are not intended to prejudice or waive any privileges or objections Textron may have with respect to any outstanding or subsequent requests for discovery.
- 2. Textron's investigation in this matter is continuing. Accordingly, it reserves the right to supplement, clarify, and revise these disclosures to the extent additional information becomes available or is obtained through discovery. Further, Textron reserves the right to amend these disclosures to the extent the claims brought by or alleged against Textron in this litigation are amended.
- 3. The time period covered by the allegations in the Plaintiffs' Second Amended Complaint is quite long and encompasses at least six decades. The geographic scope of the Second Amended Complaint is also quite broad, covering the "Newark Bay Complex" which spans the "lower 17 miles of the Passaic River, Newark Bay, the lower reaches of the Hackensack River, the Arthur Kill, the Kill van Kull, and into adjacent waters and sediments" Second Amended Complaint, P1. The scope of inquiry required by Plaintiffs and Third-Party Plaintiffs is accordingly quite broad and potentially burdensome. Textron is therefore engaged in a continuing investigation and reserves the right to supplement and modify these disclosures.

a. The name, address and telephone number, as may be known of each individual likely to have discoverable information, along with the subjects of that information, that relates to any alleged discharge or release of pollutants, contaminants and/or hazardous substances ("Pollutants") into the Newark Bay Complex (as these terms are defined in the Second Amended Complaint and the Third-Party Complaints) from the site(s) and/or properties with which the disclosing party is associated in the Third-Party Complaint ("Alleged Discharges");

Response

As to the Federal Leather Company/Belleville Industrial Site (Complaint B Paragraphs 606-630) (hereinafter referred to as "Federal Leather"):

None known at the present time.

As to Textron /Reichhold Doremus Avenue Site (Complaint B paragraphs 2503-2527) (hereinafter referred to as "Textron")

| Name/Address/Phone | Subject |
|---|--------------------------|
| Gregory Simpson | Environmental conditions |
| Textron Inc. | |
| c/o Holland & Knight LLP | |
| Jamieson M. Schiff, Environmental Counsel | Environmental conditions |
| Textron Inc. | |
| 40 Westminster Street | |
| Providence, RI 02903 | |
| (401)421-2800 | |
| Arthur E. Dieffenbach | Historic Operations |
| c/o Holland & Knight LLP | |
| John F. Brooks, Plant Manager | Historic Operations |
| (Ashland Oil & Textron Inc.) | |
| c/o Holland & Knight LLP | |
| Scott MacDonald | Environmental conditions |
| Environ Corporation | |
| 214 Carnegie Center | |
| Princeton, NJ | } |
| (609) 452-9000 | |

| William Kraft Inviron Corporation 14 Carnegie Center Princeton, NJ 609) 452-9000 Iichard Karr AACTEC Engineering & Consulting, Inc. 787 Sentry Pkwy West, Suite 120 Blue Bell, PA 19422-2200 215) 619-0292 ack Schiavone IMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* Cay Basso, Strategic Integration Manager Imergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway Sew York, NY 10007-1866* Integration Manager Imergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor Sew York, NY 10007-1866* Integration Manager Int | | Subject |
|--|--|--------------------------|
| 14 Camegie Center Princeton, NJ 6509 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509) 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 452-9000 1509 450-9022 1509 450-90 | William Kraft | Environmental conditions |
| trinceton, NJ 699 452-9000 tichard Karr AACTEC Engineering & Consulting, Inc. 787 Sentry Pkwy West, Suite 120 Slue Bell, PA 19422-2200 215) 619-0292 ack Schiavone AMEC Earth and Environmental, Inc. Robbins Road Westford, MA 01886-4113* Lay Basso, Strategic Integration Manager Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* Lat Evangelista Intergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Lichael Buriani JJ Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Lat Balakrishnan LEECRA Cleanup Oversight Section UJ Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Linistopher Gibbons, Investigator UJ Dept. of Environmental Protection UN Dept. of Environmental P | Environ Corporation | |
| trinceton, NJ 699 452-9000 tichard Karr AACTEC Engineering & Consulting, Inc. 787 Sentry Pkwy West, Suite 120 Slue Bell, PA 19422-2200 215) 619-0292 ack Schiavone AMEC Earth and Environmental, Inc. Robbins Road Westford, MA 01886-4113* Lay Basso, Strategic Integration Manager Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* Lat Evangelista Intergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Lichael Buriani JJ Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Lat Balakrishnan LEECRA Cleanup Oversight Section UJ Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Linistopher Gibbons, Investigator UJ Dept. of Environmental Protection UN Dept. of Environmental P | 214 Carnegie Center | |
| Environmental conditions ACTEC Engineering & Consulting, Inc. 787 Sentry Pkwy West, Suite 120 Blue Bell, PA 19422-2200 215) 619-0292 ack Schiavone AMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* Lay Basso, Strategic Integration Manager Intergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway Vew York, NY 10007-1866* at Evangelista Intergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* All Balakrishnan BEECRA Cleanup Oversight Section JJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Linistopher Gibbons, Investigator J.J. Dept. of Environmental Protection Division of Suste Management Division of Waste Management Division of | Princeton, NJ | |
| MACTEC Engineering & Consulting, Inc. 787 Sentry Pkwy West, Suite 120 Blue Bell, PA 19422-2200 215) 619-0292 ack Schiavone MEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* Lay Basso, Strategic Integration Manager Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* Lat Evangelista Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Lat Evangelista Environmental Conditions Late Strate Street Trenton, NJ 08625* Lat Balakrishnan LEECRA Cleanup Oversight Section VI Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator L. Dept. of Environmental Quality Sureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Late Street | (609) 452-9000 | |
| 787 Sentry Pkwy West, Suite 120 Slue Bell, PA 19422-2200 215) 619-0292 ack Schiavone AMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* tay Basso, Strategic Integration Manager Simergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway Sew York, NY 10007-1866* Tat Evangelista Simergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor Sew York, NY 10007-1866* Michael Buriani JJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Tal Balakrishnan BEECRA Cleanup Oversight Section JD Dept. of Environmental Protection 01 Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator J.Dept. of Environmental Quality Sureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Linchony J. McMahon, Chief J.Dept. of Environmental Protection Sureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Linchony J. McMahon, Chief J.Dept. of Environmental Protection Sureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Linchony J. McMahon, Chief | Richard Karr | Environmental conditions |
| 787 Sentry Pkwy West, Suite 120 Slue Bell, PA 19422-2200 215) 619-0292 ack Schiavone AMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* asy Basso, Strategic Integration Manager Imergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* at Evangelista Imergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor N.S. Environmental Protection Oil East State Street Tenton, NJ 08625* al Balakrishnan BECRA Cleanup Oversight Section NJ Dept. of Environmental Protection Oil East State Street Tenton, NJ 08625* Christopher Gibbons, Investigator N.J. Dept. of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Tenton, NJ 08608* Tenvironmental Conditions Environmental conditions | MACTEC Engineering & Consulting, Inc. | |
| Blue Bell, PA 19422-2200 215) 619-0292 ack Schiavone kMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* Lay Basso, Strategic Integration Manager mergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* at Evangelista mergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani JI Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* ala Balakrishnan BEECRA Cleanup Oversight Section JJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator J.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* unthony J. McMahon, Chief J.Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Trenton, NJ 08608* Trenton, NJ 08608* The Street Street Trenton, NJ 08608* Trenton, NJ 08608* The Street Street Trenton, NJ 08608* Trenton, NJ 08608* The Street Street Trenton, NJ 08608* Trenton, NJ 08608* The Street Street Trenton, NJ 08608* | <u> </u> | |
| ack Schiavone MMEC Earth and Environmental, Inc. Robbins Road Vestford, MA 01886-4113* Say Basso, Strategic Integration Manager Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 909 Broadway New York, NY 10007-1866* Sat Evangelista Emergency and Remedial Response division J.S. Environmental Protection Agency 190 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani JJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Sal Balakrishnan BEECRA Cleanup Oversight Section JJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Environmental conditions | · · · · · · · · · · · · · · · · · · · | |
| Environmental conditions Environmental cond | (215) 619-0292 | |
| Robbins Road Vestford, MA 01886-4113* tay Basso, Strategic Integration Manager mergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* tat Evangelista mergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* tal Balakrishnan BEECRA Cleanup Oversight Section MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator MJ. Dept. of Environmental Protection Division of Environmental Quality Sureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Inthony J. McMahon, Chief MJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Jack Schiavone | Environmental conditions |
| Robbins Road Vestford, MA 01886-4113* tay Basso, Strategic Integration Manager mergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* tat Evangelista mergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* tal Balakrishnan BEECRA Cleanup Oversight Section MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator MJ. Dept. of Environmental Protection Division of Environmental Quality Sureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Inthony J. McMahon, Chief MJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | AMEC Earth and Environmental, Inc. | |
| Restford, MA 01886-4113* Ray Basso, Strategic Integration Manager Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* Integration Agency New York, NY 10007-1866* Integration Agency Integration Agency Integration Agency Integration Agency Integrated Agency Integra | 2 Robbins Road | |
| Environmental conditions Environmental Protection Agency, Region 2 90 Broadway Sew York, NY 10007-1866* Entergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor Sew York, NY 10007-1866* Michael Buriani BJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Enristopher Gibbons, Investigator J.J. Dept. of Environmental Protection 01 East State Street Trenton, NJ 08605* Environmental Conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions Environmental conditions Environmental conditions Jan. 10, 1992 Spill April 3, 1991 Spill Environmental conditions | | 1 |
| Emergency and Remedial Response Division J.S. Environmental Protection Agency, Region 2 90 Broadway Sew York, NY 10007-1866* at Evangelista Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor Sew York, NY 10007-1866* Michael Buriani JJ Dept. of Environmental Protection JO East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator J.J. Dept. of Environmental Protection Division of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Inthony J. McMahon, Chief J.Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | Environmental conditions |
| J.S. Environmental Protection Agency, Region 2 90 Broadway New York, NY 10007-1866* Tat Evangelista Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani J.Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Tal Balakrishnan BEECRA Cleanup Oversight Section 13 Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator M.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* M.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | |
| 90 Broadway New York, NY 10007-1866* Pat Evangelista Imergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Ital Balakrishnan BEECRA Cleanup Oversight Section MJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator MJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Inthony J. McMahon, Chief MJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | - - | |
| Rew York, NY 10007-1866* Pat Evangelista Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Pal Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | |
| Environmental conditions Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Ital Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | |
| Emergency and Remedial Response division J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Tal Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | Environmental conditions |
| J.S. Environmental Protection Agency 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani J.Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Tal Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Tenton, NJ 08625* Christopher Gibbons, Investigator N.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Tenton, NJ 08608* Anthony J. McMahon, Chief N.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Tenton, NJ 08608* | | |
| 90 Broadway, 19th Floor New York, NY 10007-1866* Michael Buriani JJ Dept. of Environmental Protection 01 East State Street Frenton, NJ 08625* Jal Balakrishnan BEECRA Cleanup Oversight Section JJ Dept. of Environmental Protection 01 East State Street Frenton, NJ 08625* Christopher Gibbons, Investigator JJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Frenton, NJ 08608* Anthony J. McMahon, Chief JJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* | | |
| New York, NY 10007-1866* Michael Buriani NJ Dept. of Environmental Protection 01 East State Street Frenton, NJ 08625* Fial Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Frenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Frenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* Trenton, NJ 08608* | 4 • | Ì |
| Aichael Buriani NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Fial Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 01 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Trenton, NJ 08608* Environmental conditions Fenvironmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions Environmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions April 3, 1991 Spill Environmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions April 3, 1991 Spill Environmental conditions April 3, 1991 Spill Environmental conditions Environmental conditions | · · · · · · · · · · · · · · · · · · · | |
| NJ Dept. of Environmental Protection O1 East State Street Trenton, NJ 08625* Eal Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection O1 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Michael Buriani | Environmental conditions |
| 101 East State Street Trenton, NJ 08625* 101 Balakrishnan BEECRA Cleanup Oversight Section NJ Dept. of Environmental Protection 101 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | | |
| Environmental conditions BEECRA Cleanup Oversight Section IJ Dept. of Environmental Protection II East State Street Frenton, NJ 08625* Christopher Gibbons, Investigator IJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Frenton, NJ 08608* Anthony J. McMahon, Chief IJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* Environmental conditions April 3, 1991 Spill Environmental conditions | 401 East State Street | |
| Environmental conditions BEECRA Cleanup Oversight Section IJ Dept. of Environmental Protection II East State Street Frenton, NJ 08625* Christopher Gibbons, Investigator IJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Frenton, NJ 08608* Anthony J. McMahon, Chief IJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* Environmental conditions Environmental conditions Environmental conditions Fundamental Conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions | Trenton, NJ 08625* | |
| NJ Dept. of Environmental Protection O1 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Sal Balakrishnan | Environmental conditions |
| NJ Dept. of Environmental Protection O1 East State Street Trenton, NJ 08625* Christopher Gibbons, Investigator NJ. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief NJ. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | BEECRA Cleanup Oversight Section | Ì |
| O1 East State Street Crenton, NJ 08625* Christopher Gibbons, Investigator J.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Crenton, NJ 08608* Anthony J. McMahon, Chief J.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Crenton, NJ 08608* Environmental conditions Environmental conditions Conditions Environmental conditions Environmental conditions Environmental conditions Option of Environmental Protection Conditions Environmental conditions Environmental conditions April 3, 1991 Spill Environmental conditions Environmental conditions Option of Environmental Conditions | NJ Dept. of Environmental Protection | |
| Christopher Gibbons, Investigator N.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions Environmental conditions | 401 East State Street | |
| Christopher Gibbons, Investigator N.J. Dept. of Environmental Protection Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Trenton, NJ 08625* | |
| Jan. 10, 1992 Spill April 3, 1991 Spill Environmental Protection Anthony J. McMahon, Chief J.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management Environmental Conditions Division of Waste Management Environmental Conditions | Christopher Gibbons, Investigator | Environmental conditions |
| Division of Environmental Quality Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief J.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | N.J. Dept. of Environmental Protection | Jan. 10, 1992 Spill |
| Bureau of Emergency Response, Region 1 28 East State Street Trenton, NJ 08608* Anthony J. McMahon, Chief Bureau of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Division of Environmental Quality | · |
| 28 East State Street Frenton, NJ 08608* Anthony J. McMahon, Chief N.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* | Bureau of Emergency Response, Region 1 | . } - |
| Anthony J. McMahon, Chief N.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Frenton, NJ 08608* Environmental conditions Environmental conditions | 428 East State Street | |
| N.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Trenton, NJ 08608* | J |
| N.J. Dept. of Environmental Protection Bureau of Industrial Site Evaluation Division of Waste Management 28 East State Street Trenton, NJ 08608* | Anthony J. McMahon, Chief | Environmental conditions |
| Division of Waste Management 28 East State Street Trenton, NJ 08608* | N.J. Dept. of Environmental Protection | |
| 28 East State Street Trenton, NJ 08608* | Bureau of Industrial Site Evaluation | |
| renton, NJ 08608* | Division of Waste Management | f |
| | 428 East State Street | { |
| 4 | Trenton, NJ 08608* | |
| 4 | | |
| 4 | | |
| | 4 | |

· .

| Name/Address/Phone | Subject |
|---|--------------------------|
| J.M. Mullen, Hearing Officer | Environmental conditions |
| Commander, U.S. Coast Guard | Spills |
| Chief, Marine Environmental Protection Branch | |
| Third Coast Guard District | |
| Governors Island | |
| New York, NY 10004* | |
| Phillip D. Ashkettle, President | Environmental conditions |
| Reichhold Chemicals, Inc. | ľ |
| P.O. Box 13582 | |
| Research Triangle Park, NC 27709* | |
| Fred Malczuk | Historic operations |
| Reichhold Chemicals, Inc. | |
| 400 Doremus Ave. | |
| Newark, NJ 07105* | |
| Bob Naujelis, Environmental & Safety Manager | Environmental conditions |
| Reichhold Chemicals, Inc. | April 3, 1991 Spill |
| 400 Doremus Ave. | · |
| Newark, NJ 07105 | |
| (201)589-3789* | |
| Richard D. Barr | Environmental conditions |
| Ashland Oil Inc. | |
| P.O. Box 391 | |
| Ashland, KY 41101* | |
| M.D. Hollinger | Environmental conditions |
| Ashland Oil Inc. | \ |
| P.O. Box 391 | |
| Ashland, KY 41101* | |

^{*} Last Known Address

b. The name, address and telephone number, as may be known, of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses (unless the use would be solely for impeachment);

Response:

As to Federal Leather:

None known.

As to Textron:

| Name, Address and Phone Number | Subject |
|--|--------------------------|
| Scott MacDonald | Environmental conditions |
| Environ Corporation | |
| 214 Carnegie Center | Nex. |
| Princeton, NJ | 777 |
| (609) 452-9000 | |
| William Kraft | Environmental conditions |
| Environ Corporation | |
| 214 Carnegie Center | |
| Princeton, NJ | |
| (609) 452-9000 | |
| Richard Karr | Environmental conditions |
| MACTEC Engineering & Consulting, Inc. | |
| 1787 Sentry Pkwy West, Suite 120 | |
| Blue Bell, PA 19422-2200 | |
| (215) 619-0292 | |
| Jamieson M. Schiff, Environmental Counsel | Environmental conditions |
| Senior Environmental Health and Safety Counsel | |
| Textron Inc. | |
| 40 Westminster Street | |
| Providence, RI 02903 | |
| (401)421-2800 | |
| Jack Schiavone | Environmental conditions |
| AMEC Earth and Environmental, Inc. | |
| 2 Robbins Road | |
| Westford, MA 01886-4113* | |

^{*} Last Known Address

c. The name, address and telephone number, as may be known, of any and all past or present owners, lessees or operators at the site(s) and/or properties with which it is associated in the Third-Party Complaint and the dates of such ownership, lease or operation, as may be known;

Response

As to Federal Leather:

| Name, Address and Phone Number | Dates of Ownership |
|--------------------------------|--------------------|
| Federal Leather Company | ? until 1956 |
| Textron, Inc. | 1956-1962 |
| Air Reduction Company, Inc. | 1962- ? |

As to Textron

| Name, Address and Phone Number | Dates of Ownership | |
|--------------------------------|----------------------|--|
| Millennium Petrochemicals | Until approx. 1954 | |
| Archer Daniels Midland | Approx.1954-1968 | |
| Ashland, Inc. | Approx. 1968-1978 | |
| Textron Inc. | Approx.1978-1985 | |
| NL Industries | Approx. 1985-1989 | |
| Reichhold Chemicals, Inc. | Approx. 1989-present | |

d. With respect to any individual identified pursuant to paragraph (a), (b) or (c) above, (or any other individual known to have material knowledge of an alleged discharge or release of a Pollutant at or from a site and/or property, or into the Newark Bay Complex), any known inability to testify due to age, infirmity, or incompetency within 12 months following the date of the Initial Disclosure.

Response as to Federal Leather:

None

Response as to Textron:

None

e. A description by category and location (or copy at the discretion of the Third-Party Defendant) of all documents or electronically stored information that the disclosing party has in its possession, custody, or control with respect to Alleged Discharges including disclosure of the extent to which such documents or electronically stored information may fall within the Excepted Information.

Response as to Federal Leather:

| Category | Location | Applicable Category of Excepted Information ¹ |
|---|---|--|
| Corporate Records of Federal Leather, including purchase agreements | Holland & Knight LLP; additional documents may be available within the public domain | Some or all of these documents fall under excepted information categories a, b and g |
| Site Diagrams/sketches | Holland & Knight LLP; additional documents may be available within the public domain | Some or all of these documents fall under excepted information categories a, b and g |

Response as to Textron:

| Category | Location | Applicable Category of Excepted Information |
|-----------------------------|------------------------------|---|
| Environmental Reports, | Textron additional documents | Some or all of these |
| sampling data, | may be available within the | documents fall under |
| correspondence and related | public domain | excepted information |
| environmental documents | c/o Jamieson Schiff | categories a, b and g |
| Correspondence with | Textron additional documents | Some or all of these |
| governmental agencies | may be available within the | documents fall under |
| | public domain | excepted information |
| (| c/o Jamieson Schiff | categories a and b |
| Internal Textron | Textron additional documents | Some or all of these |
| correspondence | may be available within the | documents fall under |
| · | public domain | excepted information |
| (| c/o Jamieson Schiff | categories a and g |
| Correspondence with current | Textron additional documents | Some or all of these |
| property owners | may be available within the | documents fall under |
| | public domain | excepted information |
| | c/o Jamieson Schiff | categories a and b |
| *Textron Inc. | | |

Applicable Exception codes are as follows:

a. Information, ("Information"), including, but not limited to, environmental, chemical and/or biological testing of groundwater, surface water, soil or sediment (hereinafter "Sampling Information") contained in the nexus packages produced pursuant to paragraph 8(e) of CMO V;

b. Information previously produced to any branch, department, agency or instrumentality of the State of New Jersey including to the New Jersey Department of Environmental Protection ("NJDEP") or Information produced to any other governmental agency or entity whose responsibility it is to oversee environmental compliance in the Newark Bay Complex area, including, but not limited to, the United States Environmental Protection Agency and the United States Army Corps of Engineers (hereinafter "Governmental Recipients"); and

g. Information that falls within the attorney-client privilege and/or the attorney work product privilege.

| Correspondence with past site operators and litigation materials re past site owners and operators | Textron, additional documents may be available within the public domain | Some or all of these documents fall under excepted information category a, b and g |
|--|---|--|
| Correspondence with PRP group | Textron, additional documents may be available within the public domain | Some or all of these documents fall under excepted information categories a, b and g |

Textron's Initial Disclosures are made without prejudice to their right to change or supplement their responses, their right to assert privileges or objections with respect to any subsequent requests for discovery, and their right to introduce at trial additional evidence and documents as warranted by the development of the facts underlying this litigation,

Dated: April 14, 2010

Respectfully Submitted,

Sean C. Sheely Katherine A. Škeele

HOLLAND & KNIGHT, LLP 31 West 52nd Street

New York, NY 10019

Tei: (212) 513-3397 Fax: (212) 395-9010

Bonni F. Kaufman

HOLLAND & KNIGHT, LLP

2099 Pennsylvania Avenue, N.W.

Washington, DC 20006

Tel: (202) 955-3000

Fax: (202) 955-5564

Attorneys for Third-Party Defendant Textron Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Third-Party Defendants Textron Inc.'s Initial Disclosure was served electronically on all parties which have consented to service by posting on www.sfile.com/njdepvocc on April 15, 2010. The following counsel of record was served April 15, 2010 via first class, regular mail:

| City of Orange | John P. McGovern |
|------------------------------|-------------------------|
| | Assistant City Attorney |
| | City of Orange Township |
| | 29 North Day St. |
| | Orange, NJ 07050 |
| Borough of Hasbrouck Heights | Richard J. Dewland |
| | Coffey & Associates |
| | 465 South Steet |
| | Morristown, NJ 07960 |
| | 973.539.4500 |
| | rjd@coffeylaw.com |

Linda L. Showlund

Dated: April 15, 2010